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August 9, 2021

VIA ECF

Hon. Alison J. Nathan United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Manjarrez v. Bayard's Ale House LLC et al. Case No.: 21-cv-1968 (AJN)

Dear Judge Nathan:

We represent Plaintiff in this matter. We respectfully request that the Court adjourn for three weeks the deadline for Plaintiffs to file a motion for conditional certification of a collective action. Defendants consent to this request. The current deadlines are as follows:

- 1. Opening motion due on 8/11/2021;
- 2. Opposition due on 9/9/2021; and
- 3. Reply due on 9/16/2021.

The new deadlines would be:

- 1. Opening motion due on 9/1/2021;
- 2. Opposition due on 9/29/2021; and
- 3. Reply due on 10/6/2021.

SO ORDERED.

8/10/2021

The reason for the request is that the parties are engaged in settlement discussions to resolve this matter, which would obviously obviate the need for the motion. We therefore request the extension. Because I will be on vacation starting on August 16, 2021 until the middle of the following week, we respectfully request a three-week extension. We therefore respectfully request that the Court adjourn the deadlines as requested above.

Thank you for your attention to the above.

Case 1:21-cv-01968-AJN Document 13 Filed 08/09/21 Page 2 of 2

Respectfully Submitted,
/s/
Michael Taubenfeld